

# EXHIBIT D

Plaintiffs' Interrogatory Responses

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

GRAHAM YATES and	)	(EDNC File No.5:12-cv-00752-F)
BECKY YATES, spouse,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
AIR & LIQUID SYSTEMS	)	
CORPORATION, et al .	)	
	)	
Defendants.	)	

**PLAINTIFFS' RESPONSES TO DEFENDANTS' STANDARD  
INTERROGATORIES**

Now come Plaintiffs Graham Yates and Becky Yates and respond to defendants' standard interrogatories propounded as follows.

Plaintiffs Graham Yates and Becky Yates have not, as of the date of answering these interrogatories, completed discovery and investigation of facts, persons, documents, or other items, which may be relative to the issues of the instant action. Therefore, plaintiffs reserve the right to amend, revise or otherwise further respond to these interrogatories upon discovery of any of those items as referenced above, without prejudice to plaintiffs nor to those responses, exhibits, attachments and objections that hereinafter follow.

The standard interrogatories and the answers of these plaintiffs are attached hereto and made a part hereof.

137. If your answer to Interrogatory No. 136 is affirmative, please state the dates, times, places, names and circumstances under which such awareness, information or advice was received, and the name, address and telephone number of anyone present at the time you received such advice and/or who received the same or similar advice, information or awareness.

**ANSWER: Not applicable.**

138. Please give the names and present accurate addresses of all witnesses you propose to use at the trial of this case, either with respect to the occurrence and/or cause of your illness, with respect to your claimed damages, or with respect to the liability of these defendants.

**ANSWER: Plaintiff has not determined who will be called as an expert at trial at this time. Once this determination is made, Plaintiff will supplement this answer as required by the court. Witnesses will likely include the plaintiff, the plaintiff's family, the plaintiff's doctors, some of the plaintiff's coworkers and certain expert witnesses. Further, Plaintiffs will likely call Defendants' own corporate representatives via deposition.**

139. Please state the name, address and telephone number of each person whom you expect to call as any expert witness at trial to support any of your contentions, whether medical, or any other matter for which you intend to have expert testimony.

**ANSWER: Plaintiff has not determined who will be called as an expert at trial at this time. Once this determination is made, Plaintiff will supplement this answer as required by the court. Witnesses will likely include the plaintiff, the plaintiff's family, the plaintiff's doctors, some of the plaintiff's coworkers and certain expert**

**witnesses. Further, Plaintiffs will likely call Defendants' own corporate representatives via deposition.**

140. Please state whether any medical expert which you intend to call at trial as a state of the art witness will also testify as a diagnostic or treating medical witness.

If so, please state the name, address and telephone number of each such witness.

**ANSWER: Plaintiff has not determined who will be called as an expert at trial at this time. Once this determination is made, Plaintiff will supplement this answer as required by the court. Witnesses will likely include the plaintiff, the plaintiff's family, the plaintiff's doctors, some of the plaintiff's coworkers and certain expert witnesses. Further, Plaintiffs will likely call Defendants' own corporate representatives via deposition.**

141. Is your claim based to any extent or nature upon expert opinion other than medical experts?

**ANSWER: Yes.**

142. Please state separately as to each expert, the qualifications of such expert, the subject matter on which each said expert is expected to testify, state the substance of the facts and opinions to which each expert is expected to testify and a summary of the grounds of each such opinion and supplement this answer as you ascertain any additional expert witness.

**ANSWER: Please see response to Interrogatory 138.**

143. Please state the exact name and present accurate address of any expert witness (es) who has been consulted, retained, or specially employed by you or your

attorneys in anticipation of litigation or preparation for trial but who is not expected to be called as a witness at the trial.

**ANSWER: Plaintiff objects to this Interrogatory in that the information sought is protected by the work-product privilege and is not subject to discovery.**

February 5, 2013

Respectfully submitted,

/s/ Tiffany Dickenson

Tiffany Dickenson

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2013, the foregoing was served via electronic mail, Certified Mail and/or U.S. Mail on the following:

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ELLIOTT TURBO MACHINERY CO., WEIR VALVES & CONTROLS usa INC.  
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